

EXHIBIT 22

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

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MARK SNOOKAL, an individual,)	
)	
Plaintiff,)	
)	
vs.)	Case No.
)	2:23-cv-6302-HDV-AJR
CHEVRON USA, INC., a California)	
Corporation, and DOES 1 through)	
10, inclusive,)	
)	
Defendants.)	
_____)	

DEPOSITION OF

DR. VICTOR ADEYEYE

Volume 1, Pages 1 - 34

Taken Remotely Via Videoconference

Friday, November 15, 2024

Stenographically reported by:
Renee M. Bencich, CSR No. 11946, RPR

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Dr. Victor Adeyeye

November 15, 2024

APPEARANCES

For Plaintiff, Mark Snookal:

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Chevron Nigeria Limited

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1 THE WITNESS: Stroke. Stroke. Stroke.
2 Stroke.

3 THE COURT REPORTER: You said something after
4 that.

5 Counsel, we need to go off the record.
6 (Off the record.)

7 MS. FLECHSIG: Let's go back on the record, and
8 we can wrap things up. Okay?

9 THE COURT REPORTER: Yeah, we're back.

10 MS. FLECHSIG: Okay. Thank you.

11 So while we were off the record, our court
12 reporter explained that due to the challenges of taking
13 a verbatim record with -- with Dr. Victor Adeyeye's
14 accent, is having issues with understanding many of the
15 words and so is unable to continue for the rest of the
16 duration of the deposition.

17 She is going to produce a certified transcript
18 for the testimony that's taken place so far today with
19 the caveat that she'll need clarifications about some
20 additional information that was discussed today, for
21 example, the doctor's institutions where he did medical
22 training. And she has marked the transcript to get
23 those clarifications at the conclusion of the deposition
24 today. However, she's not able to continue for the rest
25 of the planned duration and does not feel comfortable

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1 putting her name and her license on the line in terms of
2 certifying a verbatim transcript after -- after this.

3 So we're going to go off the record after this,
4 conclude for the day, and I will see about finding a
5 court reporter who will be comfortable with
6 understanding the accents and all of that.

7 Does that -- any -- would anyone like to add
8 anything?

9 Ms. Fan?

10 MS. FAN: Yes, I would like to. Thank you,
11 Counsel.

12 From my understanding of our discussion off the
13 record, the court reporter has indicated that due to her
14 difficulty with understanding Dr. Adeyeye's accent there
15 are portions of the testimony that have been taken thus
16 far that have required interruptions on the record to
17 clarify the words that were said, and there may be other
18 words that were said previously for which the court
19 reporter did not make interruptions for clarification
20 and may require -- may still require further
21 clarification.

22 Dr. Adeyeye came to the deposition today
23 prepared to proceed and remains prepared to proceed, but
24 we understand that we are terminating the record at this
25 point due to the -- due to the court reporter expressing

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1 that she is unable to take down a verbatim transcript of
2 the record.

3 MS. FLECHSIG: One -- one thing I would like to
4 state for the record is, obviously, we did not get to
5 finish our questions for today, so we will ask that
6 Dr. Adeyeye return for another day that we can agree
7 upon for his schedule.

8 MS. FAN: And that -- yes, so we can discuss
9 that further off the record. It's our hope, you know,
10 because Dr. Adeyeye did need to take time out of his
11 clinical schedule in order to attend today that in the
12 future when arrangements are made that we are able to
13 make arrangements such that the deposition can proceed
14 and be completed at that time.

15 MS. FLECHSIG: Yes, I -- I under -- I -- I'm
16 totally fine with that, and I think we've, you know,
17 done everything we can to work with everyone's schedule.
18 And, you know, we've only gone for an hour today,
19 actually less because we started a little bit late, so,
20 you know, obviously, we'll still need to get additional
21 testimony. But we are happy to, you know, work with --
22 work with the scheduling challenges of his clinical
23 duties as well. So whatever -- whenever that is.

24 But after we conclude today, maybe we can
25 discuss when would be a good time to reschedule, and

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1 I'll make myself as available as I can to work with --
2 work with you all.

3 MS. FAN: Okay. Thank you. Appreciate that.

4 THE COURT REPORTER: Ms. Fan, do you need a
5 transcript?

6 MS. FAN: Yes, we would like a transcript.

7 THE COURT REPORTER: Thank you.

8 MS. FLECHSIG: Okay.

9 MS. FAN: And we'd also like for Dr. Adeyeye to
10 have 30 days to review any testimony that was recorded
11 today.

12 THE COURT REPORTER: Of course. And would you
13 like that to be facilitated through your office?

14 MS. FAN: Yes, please. You can go ahead and
15 send it to me.

16 THE COURT REPORTER: Okay. Thank you.

17 Are we off the record?

18 MS. FLECHSIG: Yeah, we can go off the record.

19 MS. FAN: We can go off the record.

20 MS. FLECHSIG: Thank you so much for your time
21 today, Doctor.

22 (The deposition adjourned at 7:01 a.m.)

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